

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LOUIS G. RASETTA and JOHN J. SHAUGHNESSY,  
as they are TRUSTEES, INTERNATIONAL UNION  
OF OPERATING ENGINEERS LOCAL 4 HEALTH  
AND WELFARE, PENSION AND ANNUITY FUNDS,  
and LOUIS G. RASETTA and CHRISTOPHER  
BARLETTA, as they are TRUSTEES, HOISTING AND  
PORTABLE ENGINEERS LOCAL 4 APPRENTICE  
AND TRAINING FUNDS and INTERNATIONAL  
UNION OF OPERATING ENGINEERS, LOCAL 4,  
Plaintiffs

C.A. No. 05-10425 RCL

vs.

SAI SURVEYING CORPORATION and  
BARBARA SZEPATOWSKI,  
Defendants

and

CITIZENS BANK,  
Trustee

**PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST  
SAI SURVEYING CORPORATION AND BARBARA SZEPATOWSKI**

Now come the Plaintiffs (hereinafter, the "Funds"), and request the Clerk, pursuant to Rule 55(b)(l), Fed.R.Civ.P., to enter default judgment in favor of the Funds and against Defendants SAI Surveying Corporation (hereinafter "SAI") and Barbara Szepatowski ("Szepatowski"), holding SAI and Szepatowski liable for all unpaid contributions owed to the Funds, together with interest, statutory liquidated damages, and reasonable attorneys' fees and costs as follows:

A.	Principal owed to the Funds for the period July thru December, 2004 of \$59,165.04, trebled pursuant to 18 U.S.C. §1964(c)	\$177,495.12
B.	Prejudgment interest on the unpaid contributions, as mandated by 29 U.S.C. § 1132(g)(2)(B), if all contributions were paid by the end of June, 2005	\$5,168.84
C.	Liquidated damages as mandated by 29 U.S.C. §1132(g)(2)(C)(i)	\$5,168.84
D.	Attorneys' Fees as mandated by §1132(g)(2)(D)	\$1,696.00
E.	Costs	\$125.00
	TOTAL	\$189,653.80

As grounds therefore, Plaintiffs state that default has been entered against Defendants for failure to answer or otherwise defend as to the Complaint of the Plaintiffs. Plaintiffs' claim is for a sum certain. Finally, Defendants are neither infants nor incompetent persons.

WHEREFORE, Plaintiffs respectfully request that default judgment be entered against SAI Surveying Corporation and Barbara Szepatowski.

Respectfully submitted,

LOUIS G. RASETTA and JOHN J. SHAUGHNESSY, as they are TRUSTEES,  
INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 4  
HEALTH AND WELFARE FUND, et al,

By their attorneys,

/s/ Gregory A. Geiman  
Anne R. Sills, Esquire  
BBO #546576  
Gregory A. Geiman, Esquire  
BBO #655207  
Segal, Roitman & Coleman  
11 Beacon Street, Suite #500  
Boston, MA 02108  
(617) 742-0208

Dated: June 24, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above Plaintiffs' Motion for Entry of Default Judgment Against SAI Surveying Corporation and Barbara Szepatowski has been served by certified and first class mail upon the defendants, SAI Surveying Corporation and Barbara Szepatowski at 23 Narragansett Avenue, Jamestown, RI 02835 this 24<sup>th</sup> day of June, 2005.

/s/ Gregory A. Geiman  
Gregory A. Geiman, Esquire